REMARKS

Claims 1-25 remain pending in the application.

Claims 1-25 over Roberts in view of Landfeldt

In the Office Action, claims 1-25 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over U.S. Patent No. 6,792,605 to Roberts et al. ("Roberts") in view of U.S. Patent Application No. 2002/0156841 to Landfeldt ("Landfeldt"). The Applicants respectfully traverse the rejection.

Claims 1-9 recite packaging a message object with data associated with a request from a client for transmission to a second server and transmitting the message object to the second server to allow the second server to **directly** service the client. Claims 10-18 a service-chaining module configured to package a location of at least one of an application program and data as an itinerary list into a message object, configured to transmit the message object to another server, and is configured to service the message object for transfer of at least one of an application program and data **directly** to a client. Claims 19 and 20 recite transmitting a message object containing data associated with a request from a client to a second server and initiating transfer from the second server **directly** to the client of at least one of an application program and data at the second server. Claims 21-25 recite a service-chaining module configured to receive a message object from another server containing an itinerary list of at least one of an application program and data in response to a request from one of a plurality of servers over a network, and configured to initiate a subsequent transfer of at least one of the application program and data **directly** to a client from a selected server.

Thus, Applicants' claimed features transfer a message object from one server to another server in response to a request from a client for transfer of at least one of an application program and data, with the server containing the at least one of the application program and the data **directly** servicing the client.

The Examiner acknowledged that Roberts fails to disclose allowing a second server to directly service or forward data to a client (see Office Action,

page 3). Thus, the Examiner acknowledged that Roberts discloses a second server having to transmit a message object back through a **same** path that a request is received on. A prior art reference must be considered in its entirety, i.e., as a whole, including portions that would lead away from the claimed invention. MPEP §2141.02, page 2100-127 (Rev. 2, May 2004) (citing W.L. Gore & Assoc. v. Garlock, Inc., 220 USPQ 303 (Fed. Cir. 1983), cert. denied, 469 U.S. 851 (1984)). The Applicants contend that Roberts in fact **teaches away** from transmitting a message object from anything other than a **same** path that a request is received on. Any modification of Roberts would go against Roberts' invention that **teaches away** from such a modification.

Moreover, the Examiner's proposed modification or combination would change the principle of operation of the prior art invention being modified, then the teachings of the references are not sufficient to render the claims prima facie obvious. MPEP § 2143.01, page 2100-132 (Rev. 2, May 2004) (citing In re Ratti, 123 USPQ 349 (CCPA 1959). Allowing a second server to directly service or forward data to a client is a complete change to principle of operation of Roberts. Thus, even if Landfeldt discloses what the Examiner alleges Landfeldt discloses, which he doesn't as discussed below, then the teachings of the references are insufficient to render the claims prima facie obvious.

Landfelt was relied on to disclose server communications information on the client application via a proxy path, with the proxy servers in the path then communicating directly with the client (see Office Action, pages 3 and 4).

Landfeldt appears to disclose a server that services a user application with a data stream associated with a service request (see Abstract). The server directs the data stream to a proxy which is installed in a communication path from the server to the user application (see Abstract). Proxy servers are arranged as a proxy chain within a proxy path (see Landfeldt, Fig. 2) such that they **do not require direct communication** to either the client or the server (see Landfeldt, paragraphs 32 and 33). The proxies are designed only to read input data, process the input data and then output the processed data to a

general-purpose stream, each proxy service module being unaware of any neighboring proxy service modules (see Landfeldt, paragraph 33). A proxy cradle manages and handles proxy-to-proxy communications within the proxy chain (see Landfeldt, paragraph 33).

Thus, Landfeldt's invention is directed toward a proxies that **do not** have **direct** communication to either the client or the server. A proxy cradle provides a communication path between any of the proxies and a network service point that is connected to either a data source or a data sink (see Fig. 3). Thus, Landfeldt relying on a proxy cradle to facilitate communications between any one proxy and a network service point servicing a user fails to disclose or suggest allowing a second server to directly service or forward data to a client, as alleged by the Examiner and as recited by claims 1-25.

Moreover, Roberts modified by Landfeldt is **nonsensical**. Roberts invention is directed toward a web service that processes user data requests from a number or sources (see Abstract). Landfeldt is directed toward a proxy chaining system that relies on a proxy cradle to manage proxy communications (see Abstract; paragraphs 32 and 33). Roberts fails to disclose or suggest use of any proxies that would benefit from Landfeldt's inventive features that are directed to proxies. Thus, modification of Roberts that fails to disclose proxies with features that are only disclosed as being used for proxies is **nonsensical**.

Moreover, Robert modified by Landfeldt at best would theoretically result in a web service that processes user data requests from a number or sources, with those services residing on proxies that rely on a proxy cradle to manage proxy communications. Roberts modified by Landfeldt fails to disclose or suggest transfer a message object from one server to another server in response to a request from a client for transfer of at least one of an application program and data, with the server containing the at least one of the application program and the data **directly** servicing the client, as recited by claims 1-25.

A benefit of transferring a message object associated with a request for at least one of an application program and data to second server, with the second server **directly** servicing the request is as Applicants discuss within

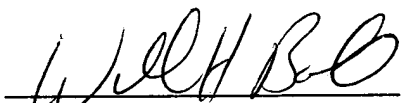
their specification, e.g., reducing network traffic. Within the prior art, a centralized location within a distributed environment is relied on to collect information requested by a client. A centralized approach requires network traffic to transfer a request to the centralized location, network traffic to retrieve the information and network traffic to send the information from the centralized location to the client. Applicants' claimed features reduce the amount of network traffic by having a server that contains at least one of a requested application program and data to **directly** service a client. Applicants' claimed features eliminate network traffic associated with having to **intermediately** transfer information to a centralized system.

Accordingly, for at least all the above reasons, claims 1-25 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Conclusion

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,



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